

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ERIC L. JEFFRIES,)	CASE NO. C-1-02-351
	:	
Plaintiff,)	JUDGE BECKWITH
	:	Magistrate Judge Hogan
v.)	
	:	
CENTRE LIFE INSURANCE CO.,)	
	:	
Defendant.)	

DECLARATION OF PLAINTIFF

1. My name is Eric L. Jeffries. I am the plaintiff in the above matter.

2. On April 7, 2004, as the Summary Jury Trial was set to begin, while sitting with my counsel, Michael A. Roberts, I overheard Mr. Roberts demand that Mr. Ellis produce surveillance videotapes and other information.

At first Mr. Ellis denied the existence of any such material. After pressing further, Mr. Ellis provided Mr. Roberts with a print out of a list of go-kart events in which my children participated in 2003. When he gave Mr. Roberts the document Mr. Ellis said "that's all there is." Mr. Roberts again demanded the videotapes. Mr. Ellis again stated that's all. I overheard Mr. Roberts then speak to Mr. Burrell but do not recall what was said in that exchange other than Mr. Roberts did question Mr. Burrell's ethics.

I declare the foregoing to be true and correct to the best of my knowledge and belief, upon penalty of perjury.

OF COUNSEL

Respectfully submitted,



CERTIFICATE OF SERVICE

The foregoing was electronically filed and thereby served on William R. Ellis, Esq., Wood & Lamping LLP, 600 Vine Street, Suite 2500, Cincinnati, Ohio 45202, this 16th day of April, 2004.

/s Michael A. Roberts